

EXHIBIT A

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Location : Galveston County [Images](#)

CASE SUMMARY

CASE NO. CV-0070916

Renato Dominguez vs. Black Elk Energy, LLC, et al

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§
§

Case Type: Injury or Damage - Other
Date Filed: 10/16/2013
Location: County Court at Law No. 2
Judicial Officer: Roberts, Barbara

PARTY INFORMATION

Lead Attorneys

Defendant **Black Elk Energy Offshore Operations, LLC**

Defendant **Black Elk Energy, LLC**
James F Hagemeier, Registered Agent
11451 Katy Freeway, Ste. 500
Houston, TX 77079

Defendant **Black Elk Management, LLC**
John G Hoffman, Registered Agent
11451 Katy Freeway, Ste. 500
Houston, TX 77079

Defendant **Black Elk Oil and Gas, LLC**
James F Hagemeier, Registered Agent
11451 Katy Freeway, Ste. 500
Houston, TX 77079

Defendant **Compass Engineering & Consultants of Texas, LLC**
Kiril L Trascher, Registered Agent
14701 St. Marys Lane, Suite 275
Houston, TX 77079

Defendant **Compass Engineering & Consultants, LLC**
Hewitt Brooks Bernard, Registered Agent
2505 Southeast EvangelineThruway
Lafayette, LA 70508

Defendant **Enviro-Tech Systems, LLC**
Frank A Richerand, Registered Agent
78219 Oak Ridge Rd
Folsom, LA 70437

Defendant **Shamrock Management Doing Business As Shamrock Energy Solutions**
Jeffery L Trahan, Registered Agent
4800 Hwy 311
Houma, LA 70360

Defendant **Wood Group PSN, Inc.**
Corporation Services Company, Registered Agent
Lawyers Incorporation Services Company
211 E 7th Street, Suite 620
Austin, TX 78701-3218

Defendant **Wood Group USA, Inc.**
Corporation Services Company, Registered Agent
211 E. 7th Street, Suite 620
Austin, TX 78707-3218

Plaintiff Dominguez, Renato

Jason A. Itkin
Retained
7132223800(W)
7132223850(F)

EVENTS & ORDERS OF THE COURT

OTHER EVENTS AND HEARINGS**Original Petition (OCA)****Case Cover Sheet****Status Conference****Citation - Service***Mailed to atty, they are attaching the Petition*

Black Elk Energy, LLC	Unserved
Black Elk Management, LLC	Unserved
Black Elk Oil and Gas, LLC	Unserved
Wood Group PSN, Inc.	Unserved
Wood Group USA, Inc.	Unserved
Compass Engineering & Consultants, LLC	Unserved
Compass Engineering & Consultants of Texas, LLC	Unserved
Shamrock Management	Unserved
Enviro-Tech Systems, LLC	Unserved

Clerk's Note*called and left message for attorney, Black Elk Energy Offshore Operations, LLC address was left off Original Petition. Told them they will have to file an Amended Petition to change it***Demand For Jury Trial****Status Conference** (2:00 PM) (Judicial Officer Roberts, Barbara)

Unofficial Record

Filed
13 October 16 P3:09
Dwight D. Sullivan
County Clerk
Galveston County

CAUSE NO. CV70916

Renato Dominguez
Plaintiff,

v.

Black Elk Energy, LLC;
Black Elk Management, LLC;
Black Elk Oil & Gas, LLC;
Black Elk Energy Offshore Operations, LLC;
Wood Group PSN, Inc.,
Wood Group USA, Inc.;
Compass Engineering & Consultants, LLC;
Compass Engineering &
Consultants of Texas, LLC,
Shamrock Management d/b/a
Shamrock Energy Solutions; and
Enviro-Tech Systems, LLC

Defendants.

§ COUNTY COURT AT LAW

§§ COURT NO. 2

GALVESTON COUNTY, TEXAS

Plaintiff's Original Petition

Plaintiff Renato Dominguez brings this action complaining of Defendants Black Elk Energy, LLC, Black Elk Management, LLC, Black Elk Oil & Gas, LLC, Black Elk Energy Offshore Operations, LLC, Wood Group PSN, Inc., Wood Group USA, Inc., Compass Engineering & Consultants, LLC, Compass Engineering & Consultants of Texas, LLC, Shamrock Management d/b/a Shamrock Energy Solutions, Enviro-Tech Systems, LLC, (all defendants collectively as "Defendants"), and would respectfully show the Court that:

I.

Jurisdiction & Venue

1. This claim is maintained under the Outer Continental Shelf Lands Act (OCSLA) 43 U.S.C. 1331 *et seq*, and state law. Venue is proper in this county as one or

more of the defendants maintain a principal place of business and a substantial part of the events giving rise to this action occurred within this county.

II.

Discovery Level

2. Discovery in this matter may be conducted under Level 2 of the Texas Rules of Civil Procedure.

III.

Parties

3. Plaintiff is a resident and citizen of Louisiana.

4. Defendant Black Elk Energy, LLC is a Texas limited liability company.

Defendant Black Elk Energy, LLC may be served with process through its registered agent:

James F. Hagemeier at 11451 Katy Freeway, Ste. 500, Houston, Texas 77079.

5. Defendant Black Elk Management, LLC is a Texas limited liability company and. Defendant Black Elk Management, LLC may be served with process through its registered agent: John G. Hoffman at 11451 Katy Freeway, Ste. 500, Houston, Texas 77079.

6. Defendant Black Elk Oil & Gas, LLC is a Texas limited liability company and. Defendant Black Elk Oil & Gas, LLC may be served with process through its registered agent: James F. Hagemeier at 11451 Katy Freeway, Ste. 500, Houston, Texas 77079.

7. Defendant Black Elk Energy, LLC is a Texas limited liability company. Defendant Black Elk Energy, LLC may be served with process through its registered agent: CT Corporation System at 250 N. St. Paul St., Ste. 2900, Dallas Texas 75201-4234.

8. Defendant Wood Group PSN, Inc. is a foreign corporation. Defendant Wood Group PSN, Inc. may be served with process through its registered agent: Corporation

Services Company d/b/a CSC – Lawyers Incorporating Services Company at 211 E. 7th Street, Suite 620, Austin, Texas 78701-3218.

9. Defendant Wood Group USA, Inc. is a Texas Corporation. Defendant Wood Group USA, Inc., may be served with process through its registered agent: Corporation Services Company d/b/a CSC – Lawyers Incorporating Services Company at 211 E. 7th Street, Suite 620, Austin, Texas 78701-3218.

10. Defendant Compass Engineering & Consultants, LLC is a Louisiana limited liability company. Defendant Compass Engineering & Consultants, LLC may be served with process through its registered agent: Hewitt Brooks Bernard at 2505 Southeast Evangeline Thruway, Lafayette, Louisiana 70508.

11. Defendant Compass Engineering & Consultants of Texas, LLC is a Louisiana limited liability company. Defendant Compass Engineering & Consultants of Texas, LLC may be served with process through its registered agent: Kirk L. Trascher at 14701 St. Marys Lane, Suite 275, Houston, Texas 77079.

12. Defendant Shamrock Management LLC d/b/a Shamrock Energy Solutions is a Louisiana limited Liability Company. Defendant Shamrock Management LLC d/b/a Shamrock Energy Solutions may be served with process through its registered agent: Jeffery L. Trahan at 4800 Hwy. 311, Houma, Louisiana 70360.

13. Defendant Enviro-Tech Systems, LLC is a Louisiana limited liability company. Defendant Enviro-Tech Systems, LLC may be served with process through its registered agent: Frank A. Richerand at 78219 Oak Ridge Road, Folsom, Louisiana 70437.

V.

Nature of the Action

14. This lawsuit is necessary as a result of personal injuries that Plaintiff received on or about November 16, 2012. On this date, several explosions occurred on the Black Elk West Delta 32E oil production platform, which is owned, operated, and controlled by Defendants. As a result of the explosions, Plaintiff sustained severe burns and injuries to other parts of his body.

17. Defendants are negligent and negligent per se for the following reasons:

- a. failure to properly supervise their crew;
- b. failure to properly train their employees;
- c. failure to provide adequate safety equipment;
- d. failure to provide adequate medical treatment;
- e. failure to provide a safe work environment;
- f. failure to inspect the platform and/or equipment;
- g. operating with an inadequate crew;
- h. failure to maintain the platform and/or equipment;
- i. vicariously liable for their employees' negligence;
- j. violating applicable Coast Guard, OSHA, and/or BSEE rules; and
- k. other acts deemed negligent.

18. As a result of said occurrences, Plaintiff sustained severe injuries to his body, which resulted in physical pain, mental anguish, disfigurement, and other medical problems. Plaintiff has sustained severe pain, physical impairment, discomfort, disfigurement, mental anguish, and distress. In all reasonable probability, Plaintiff's physical pain, physical

impairment and mental anguish will continue indefinitely. Plaintiff has also suffered a loss of earnings in the past, as well as a loss of future earning capacity. Plaintiff has incurred and will incur pharmaceutical and medical expenses in connection with his injuries.

19. Plaintiff has been damaged in a sum far in excess of the minimum jurisdictional limits of this Honorable Court, for which he now sues.

VI.

Jury Trial

20. Plaintiff hereby requests a trial by jury on all claims.

VII.

Prayer

Plaintiff prays that this citation issue and be served upon Defendants in a form and manner prescribed by law, requiring that the Defendants appear and answer, and that upon final hearing, Plaintiff has judgment against Defendants, both jointly and severally, in a total sum in excess of the minimum jurisdictional limits of this Court, plus pre-judgment and post-judgment interests, all costs of Court, attorneys' fees, punitive damages, and all such other and further relief, to which he may show himself justly entitled.

Respectfully submitted,

ARNOLD & ITKIN LLP

/s/ Jason A. Itkin

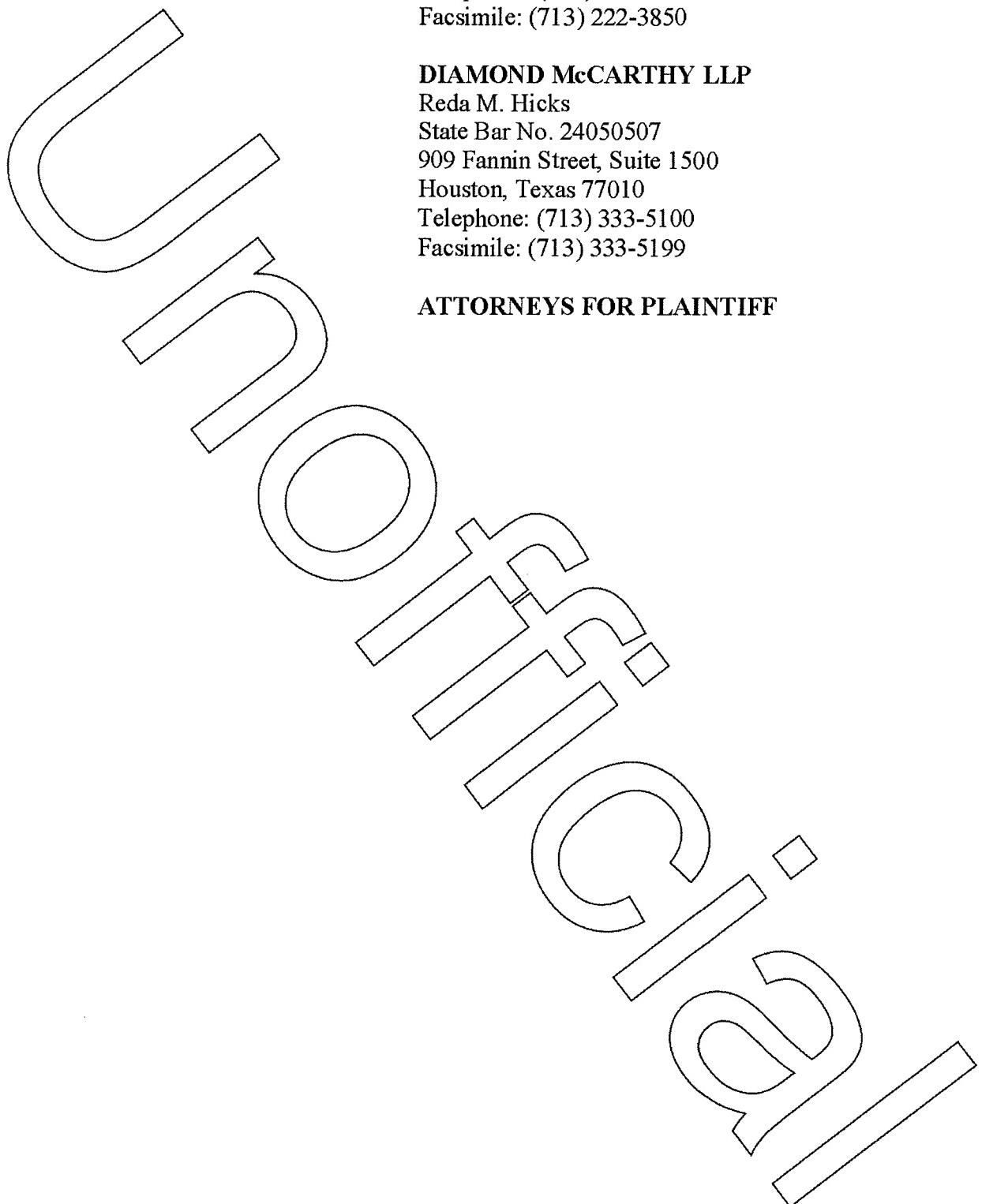
Jason A. Itkin
State Bar No. 24032461
Cory D. Itkin
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Reda M. Hicks
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Houston, Texas 77010
Telephone: (713) 333-5100
Facsimile: (713) 333-5199

ATTORNEYS FOR PLAINTIFF





CIVIL CASE COVER SHEET

Filed
 13 October 16 P3:09
Dwight D. Sullivan
County Clerk
Galveston County

COURT: County Court At Law No. 2
of Galveston County

CAUSE NUMBER: CV70916

This Civil Cover Sheet should be completed and filed with the original petition. The information should be the best available at the time of filing, understanding that the information may change before trial.

This information does not constitute a discovery request, response, or supplementation, and is not admissible at trial.

1. Styled Renato Dominguez v. Black Elk Energy, LLC et al

Plaintiff

Defendant

2. Party filing this cover sheet:

Check one: Attorney For Plaintiff(s) Plaintiff(s)

Name: Jason Itkin

Address: 6009 Memorial Drive

City/St/ZIP: Houston, Texas 77007

Telephone: 713-222-3800

Fax: 713-222-3850

Email: jitkin@arnolditkin.com

State Bar No.: 24032461

Signature: /s/ Jason Itkin

3. Plaintiff(s) (list separately)

a. Renato Dominguez

4. Defendant(s) (list separately)

a. Black Elk Energy, LLC

b. Black Elk Management, LLC

c. Black Elk Oil and Gas, LLC

d. Black Elk Energy Offshore Operations, LLC

e. Wood Group PSN, Inc.

f. Wood Group USA, Inc.

g. Compass Engineering & Consultants, LLC

h. Compass Engineering & Consultants of Texas, LLC

i. Shamrock Management d/b/a Shamrock Energy Solutions; and

j. Enviro-Tech Systems, LLC

5. Indicate case type (check only one):

CONTRACT

- Debt/Contract**
 - Consumer/DTPA
 - Debt/Contract
 - Fraud/Misrepresentation
 - Other Debt/Contract

Employment

- Discrimination
- Retaliation
- Termination
- Other Employment:

Foreclosure

- Home Equity - Expedited
- Other Foreclosure

Franchise

Insurance

Landlord/Tenant

Non-Competition

Partnership

Other Contract:

INJURY OR DAMAGE

- Assault/Battery
- Construction
- Defamation
- Malpractice**
 - Accounting
 - Legal
 - Medical
 - Other Professional Liability:

Motor Vehicle Accident

Premises

Product Liability

List product: _____

Maritime

PROBATE & MENTAL HEALTH

- Guardianship – Adult
- Guardianship – Minor
- Probate/Wills/Intestate Administration
- Other: _____

REAL PROPERTY

- Eminent Domain/Condemnation
- Partition
- Quiet Title
- Trespass to Try Title
- Other Property:

TAX

- Tax Appraisal
- Tax Delinquency

OTHER CIVIL

- Administrative Appeal
- Antitrust/Unfair Competition
- Code Violations
- Expunction
- Foreign Judgment
- Intellectual Property
- Lawyer Discipline
- Name Change
- Perpetuate Testimony
- Securities/Stock
- Torts/Tortious Interference
- Seizure/Forfeiture
- Worker's Comp
- Other:

6. Indicate sub-topic, if relevant:

- Appeal from municipal/justice court
- Attachment
- Bill of Review
- Certiorari

- Class Action
- Declaratory Judgment
- Garnishment
- Interpleader

- License
- Mandamus
- Post-Judgment
- Prejudgment Remedy

- Receiver
- Sequestration
- TRO/Injunction
- Turnover

7. Has this case been previously filed, or is it related to a case previously filed, in this county, or in another county or state?

No

Yes, in this county: Court: _____ Cause #: _____

Yes, in another county or state:

County: _____ State: _____ Cause #: _____

8. Level of Discovery:

Level 1

Level 2

Level 3

COUNTY COURT AT LAW NO. 2 OF GALVESTON COUNTY, TEXAS

COPY

CASE INFORMATION STATEMENT

October 17, 2013

THE CASE INFORMATION STATEMENT IS FOR ADMINISTRATIVE PURPOSES ONLY. IT SHALL BE FILED WITH THE PARTIES ORIGINAL PLEADINGS AND SHALL BE SERVED UPON ALL OTHER PARTIES TO THE ACTION

STYLE:

RENATO DOMINGUEZ

VS.

BLACK ELK ENERGY, LLC ET AL

CAUSE NO. CV-0970916 FILED 10/16/13

**STATUS CONFERENCE SET
FOR**

02/20/14 @ 2:00 P.M.

Attorney for Plaintiff or Pro Se

Attorney for Respondent or Pro Se

State Bar Number _____

State Bar Number _____

Address _____

Address _____

Phone Number _____

Phone Number _____

Fax Number _____

Fax Number _____

Notify defense the date Defendant may retain characters that may witness recorded testimony or unrecorded deposition. If unable to respond check response will be given at trial.

Estimated time for Discovery _____

Estimated time for Trial _____

Level 1 _____

Level 2 _____

Level 3 _____

Signature of Attorney or Pro Se Party: _____ Date: _____

ONLY ATTORNEY(S) OR PRO SE PARTY(IES) ARE TO BE PRESENT AT CONFERENCE

You may attach a Docket Control Order to list of appearance at the status conference

**FAILURE TO APPEAR AT STATUS CONFERENCE MAY
RESULT IN CASE BEING DISMISSED FOR WANT OF
PROSECUTION**

PLEASE FILL OUT AND RETURN

CAUSE NO. CV-0070916

RENATO DOMINGUEZ

VS

BLACK ELK ENERGY, LLC, ET AL.

IN THE COUNTY COURT

AT LAW NUMBER TWO (2)

GALVESTON COUNTY, TEXAS

JURY DEMAND

On this day came the Plaintiff(s), herein by their attorney, and in open court
demand a jury and having paid the jury fee; it is Ordered, Adjudged and Decreed by the
court that this cause be and the same is placed on the jury docket for trial.

Signed this, the 16 day of July, A.D. 2013.

Barbara Roberts
Barbara Roberts, Presiding Judge
County Court at Law No. 2
Galveston County, Texas

13-0070916-2
13-0070916-3:14
JULY 16 2013
RECEIVED
CLERK'S OFFICE
GALVESTON COUNTY, TEXAS